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**DISAPPROVAL OF THE SILO 1 AND 2 REMOVAL
ACTION BENTONITE EFFECTIVENESS
ENVIRONMENTAL MONITORING PLAN**

2-19-92

**USEPA/DOE
1
LETTER**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

2903

FEB 19 1992

REPLY TO THE ATTENTION OF:

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Disapproval of the Silo 1 and 2
Removal Action Bentonite
Effectiveness Environmental
Monitoring Plan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Silo 1 and 2 Removal Action Bentonite Effectiveness Environmental Monitoring Plan.

U.S. EPA hereby disapproves the plan pending incorporation of the attached comments.

Please contact Mr. James Benetti at (312/FTS) 886-6175, or Mr. James Saric at (312/FTS) 886-0992 if you have any questions.

Sincerely,

James C Benetti
James Benetti, Chief
Radiation Section

James A. Saric
James A. Saric
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ

(allen)
partial
action
response
to doe-74592
(3876)

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U.S. EPA COMMENTS ON THE SILOS 1 AND 2 REMOVAL ACTION, BENTONITE EFFECTIVENESS
ENVIRONMENTAL MONITORING PLAN

- 1) The protocol to be used to convert from headspace radon concentration to flux off the dome is overly simplistic, with no reference to origin of the governing equation nor the origin of the standard parameters.

It appears the governing equation assumes an intact concrete dome. This is simplistic since the dome is known to be profuse with cracks, including a lack of full integrity along the manway seals.

- 2) The text is contradictory throughout on the issue of confirmation of compliance with the 0.015 pCi/L criteria. In some places it is stated that confirmation will occur by direct measurement (e.g., page 2, paragraph 3, sentence 1; and page 4, paragraph 1), and in other places it is stated that confirmation is not possible, except by modeling (e.g., page 2, paragraph 3, sentence 3).

In addition, it was stated in previous comments that U.S. EPA wishes to review the real-time radon-222 monitoring data, including measurements of radon-222 in the headspace. Projections are not being sought here, but the raw data used for projections, since U.S. EPA may wish to independently verify projections. U.S. EPA has no problem with compilation of weekly, monthly or quarterly projection averages, so long as raw hourly data is provided.